To:
Raynor Asher KC
The Point Solar Farm Expert Panel Chair

Date:
15 January 2026

Re: Minute 1 of the Expert Panel (updated)
FTAA-2509-1100

Dear Raynor,

Thank you for your minute and the opportunity to respond to your questions.

We have addressed the questions raised as fully as possible in the attached tables.

In addition, we will provide a presentation that we can speak to on Friday 16 January that includes:

- A high-level overview of the application; and
- Responses to the key points raised.

Our team, along with relevant experts, will be available during the conference to discuss any matters further and answer questions.

Please let us know if you require any additional information in advance.

Best regards,

Richard

Richard Homewood
Director
For and on behalf of
Far North Solar Farm Limited

9	**The matters of particular interest of the Panel are as follows:**	**FNSF response:**
	Mana whenua issues	
9	What recent interaction has the Applicant had directly with any of the responsible hapū, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, and Te Rūnanga o Moeraki (kā rūnanga) in relation to this Application?	Following the panel convener conference, we invited these parties to an online hui on 17 December 2025. This was a step towards working together to understand the issues they have regarding the project. The next step is a site visit and a day for a hui in Christchurch to continue the discussion. This is scheduled for 20th January for the site visit and 21st January for the hui in Christchurch. We intend to cover the issues raised in their respective submissions.
10	What recent interaction has the Applicant had directly with the environmental companies working for the relevant hapū, i.e., Aoraki Environmental Consultancy Ltd and Aukaha Ltd?	We have a signed agreement to proceed our working together, covering costs and other matters. These are dated: Aukaha Limited: 16 Dec 2025 AEC Limited: 11 Dec 2025
11	Has the Applicant confirmed with any of the above entities (in questions 9 & 10) that they agree with the Applicant's identification of where wahi tupuna sites are located within the land block of interest to the application?	This will be discussed at the site visit and hui.
12	Has the Applicant confirmed with any of the above entities (in questions 9 & 10) if they agree with the Applicant's identification of where traditional nohoanga sites exist in Te Manahuna (Mackenzie Basin)?	This will be covered at the site visit and hui.

13	Has the Applicant attempted to create a joined-up strategic and spatial plan to indicate where solar farms may be located as previously requested by kā rūnanga?	No, we have focused on the site specifically, with acknowledgement that other solar farms are possibly going to proceed, whilst also highlighting the regional grid capacity constraints and the limitations.
14	Has the Applicant confirmed whether any of the above entities (in questions 9 & 10) agree with the Applicant's identification of critical taonga species that may be at risk in Te Manahuna (Mackenzie Basin)?	This will be covered at the site visit and hui, and we have a recent ecologist report to discuss with all parties.
15	Has the Applicant clarified to the above entities (in questions 9 & 10) why this particular site has been chosen as the location for the application?	The site features, including why it was selected, were covered in earlier engagement, including reasons such as it being a large flat area with high irradiance, already degraded condition with limited ecological values, existing power infrastructure and its remoteness, limited access and limited views onto the site. We intend to discuss these points in more detail in the upcoming site visit and hui.
16	Has the report from Dee Issacs (8 April 2025) been utilised to further discussion with kā rūnanga in response to their outstanding concerns in relation to the application?	Dee Isaacs was engaged to assist FNSF in its dealing with mana whenua. However following this, at the 7 November 2023 hui, FNSF were informed that they would not have any further engagement with FNSF, which we have since discussed with mana whenua and respect their decision made at that time. The report was written after this and was intended to be our basis for re-engagement. Moving forward, engagement with mana whenua will be undertaken directly by the Applicant.
17	Can the Applicant confirm in what way, if any, the project will directly affect Te Ao Mārama (Lake Benmore) via the Twizel and Pukaki/Tekapo Rivers	The project will not directly affect Te Ao Mārama (Lake Benmore) via the Twizel and Pukaki/Tekapo Rivers, as no adverse water quality impacts are anticipated (per Stormwater Assessment, Appendix K). Concerns on

	that flow past the project area. Kā rūnanga have raised concerns regarding potential discharge of contaminants or stormwater to any adjacent waterbody. Will riparian values be maintained by providing setback?	contaminants/stormwater discharge are mitigated by compliance with plans, reduced E.coli via sheep grazing, and no negative effects on watercourses. Riparian zones are avoided through significant setbacks, and overall ecological values will be improved through the EEP. Overall, the application and accompanying technical assessments demonstrate that there will be an improvement in the protection of the awa from runoff and pollution.
	RMA issues	
18	While subdivision consents are sought, there appears to be a lack of detail about what is proposed. Can the Applicant please confirm lease terms and subdivision details, and how they will liaise with Mackenzie District Council (MDC) so that the Panel is provided with an agreed set of subdivision conditions and plans?	The subdivision is to separate the areas into three titles so that they can be leased for the required term, and also allow Transpower full control over the area of the grid connection point. The non solar area on the northern boundary will be subdivided to allow the farmer to continue existing operations outside of the leasehold area. The leases will allow Transpower a 30 plus 30 year lease for their substation. An agreed set of subdivision conditions and plans will be provided post-certification, as per the updated conditions in PART E (General, Survey Plan Approval, Completion of Subdivision, Purpose of Solar Lot).
19	What, if any, further discussions with the Department of Conservation (DoC) on Wildlife Act approvals and concessions or easements have occurred, and what is the outcome of those discussions?	FNSF has had further recent engagement with DoC, with this engagement focused amending the conditions to accommodate DoC's preferred avifauna conditions, and discussing how FNSF could support avifauna programs. We expect further engagement to continue on the concession application in January. Following these discussions, and in relation to the Wildlife Act approvals, FNSF commissioned Ag Science to conduct an ecology survey in December 2025. This survey found no wildlife values to be preserved on the site, validating our site selection, and the decision to allow substantial setbacks from the site boundaries, where there may be adjacent to possible wildlife areas. We do not expect to have to apply for Wildlife Act approvals following this survey.

20	What volume of oil will be used in the proposed substation transformers and what oil or other hazardous substances are proposed to be stored on site if any?	The indicative volumes of oil in the transformers is 100k litres, based on there being two 150 MVA transformers. This oil is contained within the units, with a pan and oil separator arrangement, leading to a containment area. The site will operate as per Transpower's environmental standards, and oil on the site will be fully contained.
21	Please provide greater detail on volumes and areas of earthworks across the site, including roading, contouring and cabling.	The internal roading will have a work area of 119,344 m^2, and an estimated volume of 23,868 m^3 if required to cut to 0.2m. The cable trench area is 30,000 m^2, with a volume of 39,000 m^3, which will be replaced or removed depending on volume of infill material required. The substation has an expected cut volume of 3105 m^3, being the full 9545 m^2 cut to 0.3m. Much of this material will be reused, and additional material will be placed above this provide for the platform for the substation. The updated conditions require Soil Contamination Reporting (PSI, DSI, RAP) before earthworks commence (PART A).
22	The application does not include an application for construction-phase stormwater – does Canterbury Regional Council (ECan) agree that an application is not required?	We had not sought a construction-phase stormwater consent (only operational) based on comments received by ECan in the Section 46(2) memo. Following further engagement with ECan (email correspondence 13 January 2026 from Reuben Herz-Edinger), ECan has confirmed that a construction-phase stormwater consent is required for the wider solar farm site. However, ECan acknowledges that our current application includes construction-phase consents for the two substation areas (Section 5.3), and they are agreeable to extending the s15 discharge permit for FNSF's substation area to cover the wider solar farm site. This is addressed in the updated conditions under Construction Management Plan and Erosion/Sediment Control Plan (Table 1, PART A).

23	At various points in the application documents, a water supply is required, such as for firefighting, dust suppression, and irrigation of plants. Where is this water sourced and does that require resource consents?	The water supply for the project remains minimal, without the need for additional resource consents beyond those already aligned with general regional rules for earthworks and discharges. Specifically: • **Firefighting**: Water will be provided via an onsite tank setup, compliant with SNZ PAS 4509:2008 (New Zealand Firefighting Water Supplies Code of Practice). This is a self-contained system for emergency use, drawing from stored water rather than ongoing abstraction from external water bodies. • **Dust suppression**: Measures are outlined in the Dust Management Plan (Appendix Y), typically involving water carts or sprinklers during construction where needed. Water for this is expected to be sourced from onsite storage or low-volume existing supplies, with volumes too small to trigger a new water take consent under the Canterbury Land and Water Regional Plan rules for minor takes. • **Irrigation of plants**: This relates to establishing and maintaining drought-tolerant species in the Landscape Mitigation Strip and Enhancement Zone (per the Ecological Enhancement Plan and Wildlands Report). Irrigation will use mulch, fertiliser, and limited watering during establishment, sourced onsite (e.g., via small-scale pumps or stored water). The project design emphasizes low water demand due to the shift from intensive farming to solar with drought tolerant ecological enhancement.
24	What are the proposed construction hours and days?	Work hours and days would be matched to the district plan rules, covered by NZS 6803:1999, which includes allowed work times. The expected duration is 36 months. Updated conditions include operational noise limits for the GIP Substation (Table 3, PART D).
25	Please provide copies of all draft management plans.	Management plans are created by the contractor for each part of the construction and operational phases. As these plans are required to be very project specific and operated by the construction contractor, they will be created early in the

		construction phase of the project and then approved by the MDC/ECan. The updated conditions provide a comprehensive Management Plans Table 1 (PART A), including SEMP, CMP, and certification process.
26	Operational stormwater discharge consent for the ***substation area*** – given this is a higher risk activity, where is the point of discharge, what treatment and mitigation is proposed, and what is the discharge standard?	A stormwater and drainage assessment was completed by AECOM as part of the Substation Solution Study Report for Transpower. In sections 4.3, stormwater is detailed as being disposed of on site in two soak pits, based on the geotechnical reports showing this is suitable. The water from transformer oil catchment tank will be contained and separated, before going to a holding tank to be pumped out. Toilets on site will be serviced by a sealed tank that will require pump-out and disposal. There will be additional fire water tanks within the substation, which will be filled by truck as is planned for the onsite fire water tanks.
27	Has an assessment of transportation and traffic effects been undertaken, including engagement with MDC and New Zealand Transport Agency Waka Kotahi (NZTA)? If so, what are the outcomes of that?	The project intends to use existing exits from the road. If any work is required, this will be completed to the NZTA standards. NZTA was consulted with in the original consent and provided comment at that point and was satisfied with the access and traffic volumes. In consultation with NZTA, either a type C or Type E access will be created if any changes are needed. A CTMP will be provided to be approved by NZTA. Updated conditions include this in the CMP (Table 1, PART A).
28	There is an adjacent solar farm fast-track application, and at least one other possible nearby. Have cumulative effects been considered? What, if any, conclusions have been drawn?	A comprehensive cumulative effects assessment of the proposed The Point, Haldon Arm, and Twizel Solar Farms, along with approximately five other solar farms potentially proposed in the Mackenzie Basin is yet to be undertaken. This is because the detailed information for the Haldon Arm and The Twizel solar farms has only recently been made available / public.

		A comprehensive cumulative effects assessment can be undertaken, with direction from the Panel on what receiving environment(s) should be considered.
29	The Panel anticipates invitees questioning the completeness and drafting of the conditions suggested in the application. Has the Applicant considered the engagement of a condition writing specialist? Further, what liaison with MDC, ECan and key stakeholders is being undertaken so that the Panel can be provided with an updated and complete set of draft conditions?	The applicant has recently updated the conditions and the most recent set of conditions is attached alongside this response The applicant is already engaging with ECan and MDC on conditions, as well as with DoC, and these updated conditions have been provided on 16/01/2026. The previous revisions of the draft conditions were shared were shared with ECAN on 23 Dec 2025, and with MDC on 7 January 2026. FNSF has also shared the most recent condition set with mana whenua on 16/01/26 and expects engagement with mana whenua on conditions following our upcoming hui, as this relationship develops.
30	On Thursday 18 December the Government announced a number of new and amended national direction instruments. At first sight, it appears to the Panel that it will be obliged to consider the amended and new instruments in making its decision. Can the Applicant:	
	a. Identify which new and amended instruments are relevant.	Detail in table at end of document
	b. Explain what the applicant considers the significance of the relevant instruments are to the Panel's evaluation of the proposal.	Detail in table at end of document
	Landscape issues	

31	Could the Applicant please confirm the status of the application, as it is stated that it is non-complying in Section 1.1 of Rough Milne Mitchell's (RMM) report? It is further assumed that the s.104D gateway tests are not relevant to this application under the Fast-track Act?	We can confirm the current status of the application under the relevant planning framework is a Discretionary Activity. The Rough Milne Mitchell (RMM) Addendum Report covered off this discretionary, highlighting that the Landscape Report assessed the proposed solar farm against the relevant landscape-related objectives and policies in the Section 7 and 16 of the OMDP. As noted in Issue 31, under the Fast-track Approvals Act 2024, the s.104D gateway tests do not apply to this proposal. Instead, the application is assessed against the criteria in Schedule 5 of the Act and relevant national policy directions.
32	For how long will plant replacement continue – 5 years or 'for the term of the consent' as indicated in proposed Condition 14?	Condition 14 says we have 5 years to do all the planting, and that they will be maintained for the term of the consent. This means that if screening plants die or becomes diseased it will be replaced for the entire time. Once the trees are established, the loss of a single tree may not be noticed, but the mitigation is required the entire time. The EEP outlines a plan for the first five years of the maintenance.
33	Are any conditions proposed to address the use of recessive colours or materials on buildings and structures within the solar farm and its switch yard (excluding the actual panels)?	Yes, conditions are proposed to address the use of recessive colours and materials on buildings and structures within the solar farm and switchyard (excluding the solar panels themselves and the structures they are attached). For example, inverters, control rooms, and substation buildings are to be finished in dark, recessive colours such as black, sandstone, or gull grey, as outlined in the landscape assessment (Appendix F). This helps reduce visual contrast in the landscape.
34	Landscape Mitigation Strip planting is proposed along the southern site boundary and part of the eastern boundary – but not along the western boundary facing	The landscape mitigation is also along the eastern half of the northern boundary and the point area to the south.

	towards an elevated Ohau Canal and McAughtries Road. Is there a reason the Landscape Mitigation planting wasn't extended along the western boundary facing towards these elevated public vantage points?	Landscape mitigation planting, consisting of native vegetation is not proposed along the western boundary as it will not screen the solar farm from the elevated Ohau Canal and McAughtries Road. Conifers, standing 10m+ tall may screen the solar farm from these elevated viewpoints. However, these trees are likely to reduce the open, and expansive views experienced which is deemed more of an effect than seeing the solar farm. Also, they would contribute to wilding conifer effects. The elevated viewpoint at the Ohau C power station provides the most impacted view, and this is mitigated by the screening on the point of the land. Aside from the limited visual effects, the decision to remove visual screening along the western boundary was also guided by the feedback from DoC and the advice of Wildlands during the creation of the EEP. This feedback arose because DoC identified greater ecological benefits from lower lying native vegetation compared with screening trees. Given that RMM placed notable consideration on the benefits of the EEP, it was agreed between DoC, Wildlands, and RMM, that it would be appropriate to reduce the screening area to enhance the ecological enhancement area.
35	In asking this question, it is acknowledged that the Landscape Mitigation Planting would have a limited effect on that part of the solar farm closer to Viewpoints 8 and 9 (both on McAughtries Road), but it might reduce the extent and scale of the 'tongue' of solar farm extending northwards, generally towards Twizel.	The site is not easily visible from most locations, and generally the low viewing angle reduces the project to a very thin visual strip, as illustrated on the visual simulations. Even from McAughtries Road, the site has a very small angle of vision, due to the distance and the relative heights being the same, as well as the land, riverbanks and trees in the foreground. As a result, the low-lying design and clustering of panels, combined with the mitigation strip, should help reduce the perceived extent and scale of the northward-extending 'tongue' of the solar farm toward Twizel.
36	Proposed Condition 14 addresses the broad nature of proposed planting within the Landscape Mitigation Strip, but does not specify the quantum of planting to	The numbers of plants with the revegetation zone in the EEP at will be approximtately100,000, consisting of screening trees and low lying high value revegetation planting.

	be undertaken. Will a revised set of conditions provide some clarity about the minimum number of plants to be planted within the Landscape Mitigation Strip?	The mitigation/screening plantings are estimated at 33,900 trees, being the north mitigation strip (11,100m2 with 4,500 trees) and The Point (southern) mitigation strip being 84,000m2, with 58,000 being-planted (due to access ways inside the 40m wide strip for access and maintenance). This will have 29,400 trees. Total of 33,900 trees for screening/mitigation.
37	None of the proposed conditions currently address planting within the Enhancement Zone, even though the Wildlands Report (Appendix G) indicates that a minimum of 500,000 plants are to be planted within it, employing the species indicated on p.41 of that report. Will this gap be addressed in a revised set of conditions?	Since the Wildlands Report was authored, substantial further engagement was undertaken with DoC, and the applicant has amended the planting plan in the EEP to 100,000 plants, being a mixture of tussock, trees and shrubs, and dryland herbfield planting. The Wildlands EEP covers the revegetation/reserve areas. The mitigation areas are detailed in the RMM memo, and the numbers are above. (33,900)
38	On p.5, it is stated that the solar farm would be "co-located with the extensive Hydro Power Scheme within the Mackenzie Basin, which contributes to its character" and on p.43 it is further stated that the "solar farm will introduce another renewable energy power source to the landscape". Are these statements meant to imply that The Point Solar Farm would give rise to effects that are limited and essentially incremental because of its proximity to the Waitaki HEPS? Alternatively, does this 'association' potentially raise the prospect of cumulative effects because of the subject site's proximity to the Ohau Canal and the Ohau B and C Power Stations, i.e., as an extension to the existing 'energy generation landscape'?	The statements on pages 5 and 43 of the RMM report highlight the existing renewable large-scale power generation activity that contributes to the Basin's character and that the effects of proposed solar farm will be limited, as assessed in the Landscape Report. The proposal will result in an increase in development within the Basin, which will subsequently reduce the Basin's open character. However this reduction in open character will not impact on the wider basin as assessed in the Landscape Report. Whilst the Waitaki Hydro Electric Power Scheme and The Point Solar Farm are both large scale power generation development, together they will not result in adverse cumulative effects because they are two separate types of development. Importantly, the solar farm will assist in retaining the aesthetic and associated values of the dammed Lakes and their recreational uses. This is because the solar farm will contribute as a daytime power source, relieving the full-time use of the hydro scheme. In doing so, the lake levels will be maintained at a higher level for

		longer, especially during the dryer summer and winter months and during droughts, which are predicted to become more frequent as our climate continues to change.
39	In relation to this matter, it is noted that reference is only made to cumulative effects with reference to the Mackenzie District Plan's Policy 3B2, but not to cumulative effects that might arise from co-location near other energy production facilities. Importantly, this 'umbrella' of energy generation utilities might also embrace the Haldon Solar Farm across the Pukaki River (near Viewpoint 16 on Haldon Road and the Haldon Solar Farm site). Could RMM comment on how such effects should be regarded and assessed?	As per Issue 28, a comprehensive cumulative effects assessment can be undertaken, with direction from the Panel on what receiving environment(s) should be considered.
40	Appendix V identifies The Point site as being within an area of High Visual Vulnerability, which has a low capacity to absorb change. Are RMM aware of the criteria employed to determine that the site was within an area of High Visual Vulnerability?	It is RMMs understanding that the visual vulnerability maps were prepared by Mr Graham Densem, in the Mackenize Landscape Study, dated December 2007. This mapping exercises was informed by the 2007 Landscape Study that it formed a part of.
	Ecology	
	Field investigations information	
41	Please provide comment on the adequacy of ecological field investigations undertaken in terms of accurately quantifying and understanding the ecological characteristics and values on site.	The field investigations we conducted were sufficient to accurately quantify and understand the ecological characteristics and values on the site. They were based on initial surveys, such as those for vegetation, avifauna, lizards, and invertebrates carried out between December 2022 and February 2023, which helped us map out values using species lists and criteria from the Canterbury

		Regional Policy Statement. The recent site inspection on 17 December 2025 further confirms this adequacy, as it found the entire site has been cultivated into dryland pasture with no indigenous vegetation communities or significant floristic values present, and no natural habitat for indigenous fauna due to the high level of modification. While there were some gaps in targeted trapping survey for lizards and invertebrates, this latest inspection largely resolves those concerns. Updated conditions require Ecological Enhancement Plan (EEP) certification, a potential lizard management plan (LzMP) (Table 1, PART A), a Robust Grasshopper Management Plan (RGMP), and an Avifauna Management Plan (AMP)
	Assessment of ecological effects	
42	Please provide further comment on:	
a)	(a) The adequacy and appropriateness of the assessment of effects methodology and how conclusions on the level of effect were reached, with particular focus on:	Our methodology for assessing ecological effects was adequate and appropriate, drawing on both survey data and desktop research to make conservative predictions about potential impacts. We reached conclusions on the level of effects through habitat and effects tables in the reports. Any uncertainty, such as around species like the nationally critical Lepidium solandri or lizards where effects were initially marked as 'TBC', is now low thanks to the December 2025 inspection, which confirms the absence of these values and reduces those effect levels to negligible. Wildlands agreed that the chances are low, due to the changes in ground cover already occurring due to farming, and the solar area having low vegetation, and avoiding the site edges, where these critical species may be found.
a)1	1) How effects can be understood when there is considerable uncertainty around the presence, abundance and in some cases distribution of species across the site and immediate surrounds, e.g., for the nationally critical Lepidium solandri	The Wildlands assessment applied a good degree of transparency, rigour, and appropriateness in evaluating effects. For instance, effects on individual habitat types and species were assessed ecologically. The focus was on factors such as habitat loss and fragmentation. Effect levels were expressed using proper ecological descriptors rather than just planning terms. The threat status of species was factored into the magnitude of effects to determine overall levels.

		When assessing magnitude, the Wildlands assessment considered several key aspects. These included the spatial scale of the effect itself. It also covered the proportion of affected habitat relative to what is available at different scales. Duration and timescale of the effect were evaluated. Any time lag between the effect and mitigation outcomes was taken into account where relevant. The level of confidence in the expected magnitude was considered, along with how avoidance or minimisation measures reduce severity. The degree of uncertainty was addressed, including probability versus consequence for nationally threatened braided river birds such as kakī. The precautionary principle was incorporated for threatened species like kakī. Cumulative effects were also examined, particularly for highly mobile species such as kakī.
a)2	2) How effects on lizards can be understood when the assessment states the level of effect is 'TBC'.	Wildlands have advised that following the survey results from Ag Science, and in light of the reduced solar footprint - and the fact that the entire array area has been cultivated – means that an updated lizard habitat survey may suffice in the place of a targeted lizard survey.
b)	b) The degree of transparency, rigour, and appropriateness applied to the assessment of effects, including but not limited to clarification of:	
b)1	How effects on individual habitat types or species were assessed, which is not evident.	The Assessment of Ecological Effects (AEE, Wildlands 2025), clearly identifies the habitats on the site and their values for flora and fauna species. The report also clearly identifies the impacts to those habitats. From the synthesis of theses assessments, the impacts on individual habitat types and/or species are calculated (e.g. exotic grassland on the site does not provide habitat for indigenous flora therefore the clearance of this habitat will have nil or negligible effect on indigenous flora).

b)2	The level of effect, expressed using appropriate ecological effect descriptors rather than planning terms such as more than minor.	The terminology used follows the clearly defined RMA statutory framework which applies to ecology. 'More than Minor Adverse Effects', are adverse effects that are noticeable that may cause an adverse impacts but could be potentially mitigated or remedied. More than minor, is a level of effect, which is a legislative trigger in the RMA and therefore an important test threshold for effects assessment.
b)3	How the relationship between threat status and magnitude of effects was assessed in determining a level of effect.	Species with a high threat raking have higher ecological value (or significance). The level of effect is a derived from the size or magnitude of effect and the ecological significance of what is being effected (e.g. high magnitude and high ecological significance = very high level of effect).
b)4	How the relationship between threat status and magnitude of effects was assessed in determining a level of effect.	
b)4.1	Spatial scale of the effect per se;	As above.
b)4.2	Proportion of affected habitat relative to availability at various spatial scales	Ecological District and landscape scale effects are assessed where relevant. However, the affected habitat on the site is exotic grassland, not a significant indigenous habitat. Microscale habitats present on the site (e.g. drylands) are not mapped in the LCDB (of other spatial data resources) with sufficient detail to undertake any meaningful assessment, and providing an assessment of these at spatial scales creates complexity to the assessment without providing any meaningful value or further understanding.
b)4.3	Duration and timescale of the effect	Where the effect is ongoing it is listed as such. Where they are temporary or related to the construction phase this is also identified.
b)4.4	Time lag between effect and mitigation outcomes where applicable, in respect of key ecological factors;	Potential effects mostly relate to avifauna – management of these effects

		requires monitoring and adaptive management. The applicant has also proposed proactive mitigation and offsetting through pest control on-site and around the surrounding river-delta, and by collaborating with DoC on supporting the Kaki recovery program.
b)4.5	Level of confidence in understanding the expected magnitude of effect and the degree to which proposed avoidance, minimisation or remediation measures reduce the severity of effect;	As above for birds. High confidence for other effects.
b)4.6	The degree of uncertainty and the degree of probability versus consequence for nationally threatened braided river birds, particularly for Kakī;	There is a lack of international and local information on the potential bird strike risk and monitoring and (if required), adaptive management is needed to better understand and manage this.
b)4.7	How the assessment factored in the precautionary principle in relation to nationally Threatened species such as Kaki	The level of effect has been determined at a conservative level (e.g. where a range of effects are possible the more significant effect is used). However, as above a number of 'unknowns' remain around potential effects on Kaki
b)4.8	Cumulative effects – particularly for highly mobile species such as Kakī.	The number and location of all the other solar farms in the areas was not known when we undertook our assessment – this needs further consideration.
	Effects management	
43	Please provide further comment on the adequacy and appropriateness of the proposed effects management package, with particular focus on:	The proposed effects management package is adequate and appropriate overall. The uncertainty about the presence, abundance, and distribution of species on the site and nearby has been largely resolved by the December 2025 inspection, which shows limited to no values exist. The application provides a reasonable level of detail for the effects management measures, particularly for threatened plants, avifauna, and lizards, with appropriate management plans now detailed in table 1 of the updated condition set. There is a high degree of certainty that these measures will counterbalance the effects and achieve the stated outcomes, as the effects are now seen as largely negligible. The package aligns well with good practice principles for offsetting and compensation, mainly through on-site

		actions, but since there's no significant loss identified, offsetting isn't strictly necessary. FNSF have demonstrated best endeavours to protect and maintain habitat that meets ecological significance criteria under the Canterbury Regional Policy Statement, though the inspection confirms limited values are present on the development site itself.
a	The level of uncertainty regarding the presence, abundance, and in some cases distribution, of species across the site and immediate surrounds;	
b	The level of detail provided for proposed effects management measures, particularly for threatened plants, avifauna and lizards;	No threatened plants were recorded within the footprint. The management proposed includes rehabilitation and planting of key habitats for threatened plants – providing a net gain. Targeted lizard surveys are no longer likely to be required based on the recent Ag Science survey, and an updated lizard habitat survey would suffice. An avifauna management plan will be implemented to manage avifauna effects. The updated condition set in table 1 covers management plans for avifauna and lizards
c	The degree of certainty that proposed effects management measures will counterbalance the level of effects and achieve stated outcomes;	This will be provided through the ecological management plan for the site.
d	Alignment with good practice offsetting/compensation principles;	If required, this will be provided through the ecological management plan for the site.
e	The extent to which the application demonstrates best endeavours to ensure the protection and maintenance of habitat that meets criteria for ecological significance in accordance with the relevant policies and objectives in the Canterbury Regional Policy Statement.	No ecologically significant habitat is present within the works footprint

	Consent conditions	
44	Please provide further comment on the adequacy and appropriateness of the proposed consent conditions in providing confidence and certainty that effects management actions will adequately address effects.	The proposed consent conditions are adequate and appropriate to provide confidence and certainty that the effects management actions will properly address any ecological effects. They include requirements for permits, detailed plans, and monitoring. Given the findings from the December 2025 inspection that there are negligible ecological values needing direct management beyond enhancement, the revised conditions are conservative and should provide certainty that effects will be appropriately managed. Updated conditions include Table 1 management plans certification by Consent Authorities (PART A).
	Management plans	
45	Please provide comment on:	
	a) the adequacy of detail provided in the Ecological Enhancement Plan, particularly in relation to the timing and certainty around achieving stated outcomes including but not limited to:	The detail provided in the Ecological Enhancement Plan is adequate, though there are some gaps we can address. For example, while there is little information on the existing mammalian pest assemblage or indigenous biodiversity values, this isn't critical since the December 2025 inspection confirms limited to no indigenous values are present. The likelihood of successfully establishing the proposed planting species is high, given the methods and their suitability to the area. There is no set specific pest reduction targets, but suppressing mice at the proposed scale to support invertebrate and lizard recovery is feasible. There is no real potential for net negative outcomes for lizards or invertebrates from inadequate pest control, as no such fauna are present. The duration of weed and mammalian pest control is proposed to be ongoing as required, with expectations that biodiversity outcomes will be self-sustaining once these actions cease. The possibility of exotic grasses and herbs outcompeting nationally threatened will be managed through the delivery of the EEP, noting that on that the site is currently dominated by exotic grasses and any introduction of native species will provide a net ecological gain. Monitoring will involve UAV

		surveys, walk-throughs, and before-after-control-impact approaches for at least five years to verify outcomes and guide adaptive management if needed. Overall, the balance between the scale and intensity of the enhancement package should be sufficient to achieve the stated outcomes.
1	The absence or near absence of any information on the existing mammalian pest assemblage and indigenous biodiversity values;	
2	The likelihood of successful establishment of species proposed for planting for which successful establishment is likely to be challenging;	Plant species have been selected based on the site and are all known to grow well in this area and habitat. Planting is proposed to take place in spring (not winter) to avoid potential frost damage and losses. Monitoring for weather extremes (e.g prolonged drought), and if required watering has been factored into the plant establishment.
3	The absence of pest reduction targets and the likelihood of mice suppression at the scale proposed and to the level needed to facilitate the recovery of invertebrates and lizards;	Answered above
4	The potential for net negative outcomes for lizards or invertebrates that may arise if mammalian pest control is not adequate;	Lizards and invertebrates on the site boundaries are already under predation pressure. Where enhancement or translocations occurs, this will be managed through the ecological management plan for the site.
5	The duration of weed and mammalian pest control proposed and expectations on biodiversity outcomes once these actions cease;	Answered in 45 a)

6	The potential for exotic grasses and herbs to outcompete nationally threatened or at-risk flora that are likely to be present once mammalian browsers are suppressed and why this hasn't been considered in the assessment of effects;	The areas where threatened or at-risk flora are present are outside of the site. These are areas with rocky skeletal soils along the terrace edge, that do not provide good habitat for exotic grasses and herbs, which is why the threatened or at-risk flora can survive here.
7	The type, level of effort and duration of proposed biodiversity outcome monitoring to verify stated outcomes are achieved and/or inform adaptive management/contingency actions where required;	This will be provided in management plans, required by consent conditions (e.g. avifauna management).
8	Consideration of the balance between the scale and intensity of the proposed ecological enhancement package and implications for achieving stated outcomes.	
	b) the rationale for not including other ecological management plans necessary to understand the degree to which effects on ecological values are adequately and appropriately addressed, e.g., an avifauna plan, lizard management plan, and invertebrate management plan.	These are now proposed and are detailed in table 1 of the amended conditions.
	Additional ecology work	
46	Please provide commentary on any further ecological work that has or is proposed to be undertaken, that was not included in the substantive application.	The further ecological work undertaken since the Substantive Application was lodged includes the site inspection on 17 December 2025, as detailed in the AgScience report. This confirms there are no indigenous values on the site and

		that no additional assessments are needed. We had considered targeted surveys for lizards, avifauna, invertebrates, and vegetation, but based on this recent inspection, targeted surveys have been deemed unlikely to be necessary.
47	MDC's comments on the substantive application (Appendix V) raise an issue concerning the potential for clearance of ecologically significant indigenous vegetation, including threatened and at-risk species. This can be found at page 4 of the comments in the discussion of Plan Change 18. Can the Applicant:	The areas where threatened or at-risk flora are present are outside of the site and will be avoided. There is potential to enhance these areas.
a	Confirm whether consent is being sought to clear indigenous vegetation; and	We are not seeking consent to clear indigenous vegetation, as none is present according to the December 2025 site inspection. Scattered individual indigenous plants are present at very low densities near the boundaries of the site outside of the solar array area, but nothing that meets the MDC's definition of indigenous vegetation in their operative plan.
b	If so, identify the location and species affected; and	This is not applicable, given the above.
c	identify where the significance of the proposed indigenous vegetation clearance has been assessed in the AEE.	The significance of any proposed indigenous vegetation clearance was assessed in the AEE and Appendix G, and updated by the December 2025 inspection, which shows the site is dominated by exotic species with no indigenous communities or values that meet the Canterbury Regional Policy Statement criteria. The Mackenzie District Council's comments on potential clearance have been addressed, as there's no vegetation to clear.
d	If the answer to (a) is that consent is not being sought to clear indigenous vegetation, how is that to be avoided or otherwise handled?	Since no indigenous vegetation exists, clearance is avoided inherently. Our design still includes buffers and enhancement measures to achieve a net gain in restoration areas.

Notes on Point 30, new and amended national direction instruments:

Instrument (Amended)	Nature of Amendment	Relevance to The Point Proposal	Significance to the Panel's Evaluation
New Zealand Coastal Policy Statement – Amendment 2025	Amendments to policies addressing climate change adaptation, coastal hazard risk and effects management.	Not relevant – the proposal does not involve Coastal Marine Areas.	Not applicable.
National Policy Statement for Indigenous Biodiversity – Amendment 2025	Amendments to mining and quarrying provisions specifically.	Not relevant – no mining or quarrying activities form part of the proposal.	Not applicable.
National Policy Statement for Freshwater Management – Amendment 2025	Amendments to freshwater objectives, including the role of Te Mana o Te Wai, limits and implementation direction, including clarifications around consent decision-making.	Relevant to the proposal in relation to surrounding waterbodies around the Site, noting there are no waterbodies or wetlands on Site.	Requires the Panel to have regard to the amended freshwater direction when evaluating effects, particularly in relation to amended / new objectives and policies.
National Environmental Standards for Freshwater – Amendment 2025	Amendments to activity classifications and standards for activities affecting freshwater and wetlands.	Not relevant – no consents sought under the NES-Freshwater.	Not applicable.
National Policy Statement for Highly Productive Land – Amendment 2025	Amendments include exempting LUC 3 land, introducing new 'Special Agricultural Areas' and providing a clearer pathway for specified activities.	Not relevant – the Site is LUC 6 and therefore not considered to be Highly Productive Land.	Not applicable.

National Policy Statement for Renewable Electricity Generation – Amendment 2025	• Expanded scope and definitions: introduces new concepts such as ancillary REG activities, existing REG site, operational need/functional need, upgrading, repowering, and resilience (Part 1 – Interpretation). • New and expanded benefits: expressly includes electricity storage, resilience and independence of supply, reduced losses from proximity to demand, and co-location opportunities (Policy A). • Stronger direction on cumulative effects: requires enabling cumulative increases in REG capacity/output and avoiding overall or cumulative losses (Policy B). • Clearer locational tests: operational/functional need must be recognised and provided for; alternative site assessment is not required to show such need (Policy C). • New Māori interests policy: requires recognition and provision for Māori interests, engagement outcomes, and opportunities for tāngata whenua to develop/partner in REG (Policy E). • New lifecycle focus for existing assets: separate policies to enable operation/maintenance (Policy G) and to support reconsenting, upgrading and	Highly relevant	Expect greater weight on the national significance and broad benefits of REG, including emissions reduction and security/resilience outcomes. Early and well-documented engagement with tāngata whenua is more clearly relevant to decision-making under the dedicated Māori interests policy.

	repowering with flexibility for new technology (Policy H). • Updated 'national direction' interactions and exclusions in the explanatory note (eg, • electricity transmission/distribution and other NPS instruments).		
National Policy Statement for Electricity Networks – Amendment 2025	Amendments strengthening recognition and protection of electricity network infrastructure.	Not relevant to the proposal – does not involve electricity distribution networks.	Not relevant.
National Policy Statement for Infrastructure 2025	New policy to manage and enable infrastructure development – excludes: • Renewable electricity generation (covered by the National Policy Statement for Renewable Electricity Generation). • Electricity transmission and distribution networks (covered by the National Policy Statement for Electricity Networks). • Freshwater allocation and prioritisation (addressed by regional councils).	Not relevant as does not apply to renewable electricity generation activities.	Not relevant.
National Policy Statement for Natural Hazards 2025	New policy to provide for a consistent approach for managing natural hazard risks in new development.	Not relevant – this NPS does not apply to infrastructure (as defined by the RMA).	Not relevant.